

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF PENNSYLVANIA**

RENEE ZINSKY,

Civil Action No. 2:22-cv-547(MJH)

Plaintiff,

The Honorable Marilyn J. Horan

v.

MICHAEL RUSSIN, RUSSIN FINANCIAL,
RUSSIN GROUP, SIMON ARIAS, III,
ARIAS AGENCIES, S.A. ARIAS
HOLDINGS, LLC, AMERICAN INCOME
LIFE INSURANCE COMPANY,

ELECTRONICALLY FILED

Defendants.

**AIL'S MOTION FOR LEAVE TO FILE RESPONSE TO
PLAINTIFF'S PROPOSED ORDER AND SUR-REPLY TO
MOTION TO CONFIRM ARBITRATION AWARD**

AIL respectfully requests leave to file the attached response to Plaintiff's Proposed Order and Sur-Reply. Dkt. Nos. 136, 136-1. Because Plaintiff's Sur-Reply and Proposed Order seeks new relief and makes new arguments in favor of such relief, AIL seeks leave to briefly respond and respectfully requests the Court consider its Response attached hereto as **Exhibit A**.

Dated: April 3, 2024

Respectfully submitted,

By: /s/ Andrea M. Kirshenbaum

LITTLER MENDELSON, P.C.

Andrea M. Kirshenbaum (Pa. Bar No. 88030)
Three Parkway
1601 Cherry Street, Suite 1400
Philadelphia, PA 19102 Tel: (267) 402-3076
Fax: (267) 402-3131
Email: AKirshenbaum@littler.com

KING & SPALDING LLP

Jeffrey Hammer* (Cal. Bar No. 264232)
James A. Unger* (Cal. Bar No. 325115)
633 West Fifth Street, Suite 1600
Los Angeles, California 90071
Tel: (213) 218-4002
Fax: (213) 443-4310
Email: jhammer@kslaw.com
Email: junger@kslaw.com

Anne R. Dana* (NY Bar No. 5011366)
1185 Avenue of the Americas
34th Floor
New York, NY 10036
Tel: (212) 556-2100
Email: adana@kslaw.com

**Admitted Pro Hac Vice*

CERTIFICATE OF SERVICE

I hereby certify that on April 3, 2024 a true and correct copy of the foregoing document was served and filed using the Western District of Pennsylvania's ECF system, through which this document is available for viewing and downloading, causing a notice of electronic filing to be served upon the following counsel of record:

Amy Williamson, Esquire
WILLIAMSON LAW
429 Fourth Avenue, Suite 300
Pittsburgh, PA 15219
awilliamson@awilliamsonlaw.com

Janice Marie Savinis
SAVINIS, KANE, & GALLUCCI
436 7th Avenue, Suite 322
Pittsburgh, PA 15219
jsavinis@sdklaw.com

John R. Kane
SAVINIS, KANE, AND GALLUCCI
436 7th Avenue, Suite 322
Pittsburgh, PA 15219
jkane@sdklaw.com

Michael J. Gallucci
SAVINIS, KANE, & GALLUCCI
436 7th Avenue, Suite 322
Pittsburgh, PA 15219
mgallucci@sdklaw.com

Attorneys for Plaintiff Renee Zinsky

Jean E. Novak, Esquire
STRASSBURGER MCKENNA GUTNICK AND GEFSKY
Four Gateway Center, Suite 2200 444
Liberty Avenue Pittsburgh, PA 15222
jnovak@smgglaw.com

Attorneys for Defendants Simon Arias, III, Arias Agencies and S.A. Holdings, LLC

Benjamin D. Webb, Esquire
COZZA LAW GROUP
510 Washington Avenue Carnegie, PA 15106
bwebb@cozzalaw.com

Attorney for Defendants Michael Russin, Russin Group, LLC and Russin Financial

/s/ Andrea M. Kirshenbaum
Andrea M. Kirshenbaum